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5 **UNITED STATES DISTRICT COURT**

6 **DISTRICT OF NEVADA**

7 TSAI-LU SHEN, an individual,
8 Plaintiff,
9 v.
10 MICHELLE LACOUR, an individual; DOES I-X, inclusive; and ROE CORPORATIONS I-X, inclusive,
11 Defendants.

12 MICHELLE LACOUR,
13 Counterclaimant,

14 v.
15 TSAI-LU SHEN,
16 Counterclaim
Defendant,

17 MICHELLE LACOUR,
18 Third-Party Plaintiff,
19 v.
20 JAYSON BAYBUTT and PUBCO
REPORTING SOLUTIONS, INC.,
21 Third-Party Defendants.

Case No: 2:19-CV-01564-JAD-VCF

STIPULATION AND PROPOSED ORDER TO EXTEND PLAINTIFF TSAI-LU SHEN'S DEADLINE TO FILE ITS RESPONSE TO COUNTERCLAIM (ECF NO. 79 AND ECF NO. 109)

(First Request)

25 Pursuant to Local Rule 7-1, Plaintiff/Counterclaim Defendant, Tsai-Lu Shen's,
26 ("Shen"), and Defendant/Counterclaimant Michelle LaCour's ("Defendant" or "LaCour")
27 by and through their counsel of record, hereby stipulate and agree as follows:
28

1 1. To continue Plaintiff's deadline to file his response to the remaining
2 Counterclaims, extending extend the deadline from February 16, 2021 to and including
3 March 16, 2021.

4 2. Plaintiff expressly reserves all defenses or objections to the lawsuit and the
5 right to file additional claims.

6 3. This Stipulation is based upon the fact that all parties are in settlement
7 discussions and the additional time is necessary for the parties to engage in talks and
8 attempt to finalize a universal settlement.

9
10 Respectfully submitted by:

11 Dated: February 12, 2021

12 /s/ Kimberly P. Stein
13 KIMBERLY P. STEIN, ESQ.
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16 *Attorneys for Plaintiff/Counterclaim
Defendant Tsai-Lu Shen*

11 Dated: February 12, 2021

12 /s/John H. Jamnback
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21 *Attorneys for Defendant Michelle LaCour*

22 **IT IS SO ORDERED.**

23 Dated this 18th day of February, 2021.

24
25 _____
26 UNITED STATES MAGISTRATE JUDGE
27
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